



# Healthy Nail Salon Recognition Program Guidelines

STATE OF CALIFORNIA

ENVIRONMENTAL PROTECTION AGENCY

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

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This document was prepared by the Department of Toxic Substances Control, Safer Consumer Products Branch and Office of Environmental Justice and Tribal Affairs.

**Principal author:** Dicle Yardimci, Ph.D.

**Contributing staff:** Dennis Guo, Ph.D., Christine Papagni, Brittani Orona, Mailo Numazu, Erika Giorgi, JD; Allen Martin, Coby Graham, David Grealish, and Brian Taylor

**Under supervision of:** André Algazi, Karl Palmer, and Ana Mascareñas, MPH

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Megan Kalsman, City and County of San Francisco Healthy Nail Salon Recognition Program

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Karl Bruskotter, City of Santa Monica Healthy Nail Salon Recognition Program

Myle Huynh, Alameda County Healthy Nail Salon Recognition Program

Laurie Foster, King County, Washington, Healthy Nail Salon Recognition Program

Catherine Porter, California Healthy Nail Salon Collaborative

Dung Nguyen, California Healthy Nail Salon Collaborative

Lisa Fu, California Healthy Nail Salon Collaborative

Julia Liou, California Healthy Nail Salon Collaborative

Ann Blake, Ph.D., Environmental and Public Health Consulting, Alameda, California

Carrie Harris, California Board of Barbering and Cosmetology

Paula Johnson, Ph.D., California Department of Public Health

Joseph Calavita, Irina Malkina, Barbara Zavala, Terri Edwards, and Peggy Jenkins, California Air Resources Board

Eric Berg, Keummi Park, and Jason Denning, The Division of Occupational Safety and Health

Justin Malan, Virginia W St. Jean, Heather Forshey, Jason Boetzer, Marilyn Underwood, and Stephanie Cushing, California Conference of Directors of Environmental Health

Ali Elman and Julianne Pfister, Base Coat Nail Salon

*Note: The pictures in these guidelines are used by permission of San Francisco Department of Environment, Healthy Nail Salon Recognition Program.*

## **ABBREVIATIONS AND ACRONYMS**

**BBC:** Board of Barbering and Cosmetology

**Cal/OSHA:** The Division of Occupational Safety and Health

**CESQGs:** Conditionally Exempt Small Quantity Generators

**CUPA:** Certified Unified Program Agency

**DOSH:** The Division of Occupational Safety and Health

**DTSC:** Department of Toxic Substances Control

**DBP:** dibutyl phthalate

**HNSR program:** Healthy Nail Salon Recognition program

**LEV:** Local Exhaust Ventilation

**MEK:** methyl ethyl ketone

**MMA:** methyl methacrylate

**NIOSH:** The National Institute for Occupational Safety and Health

**OSHA:** Occupational Safety and Health Administration

**PPE:** Personal Protective Equipment

**SDS:** Safety Data Sheet

This document contains statewide guidelines for Healthy Nail Salon Recognition (HNSR) programs. It was prepared by the Department of Toxic Substances Control (DTSC) pursuant to Assembly Bill 2125 (Chiu; Stats. 2016, ch. 564) and is intended to be used by local government agencies in California that voluntarily establish HNSR programs in their jurisdictions. DTSC finalized the guidelines after reviewing feedback from local government agencies and consulting with the Division of Occupational Safety and Health (DOSH, also known as Cal/OSHA), the California Department of Public Health, the California Board of Barbering and Cosmetology (BBC), the California Air Resources Board, the National Institute for Occupational Safety and Health (NIOSH), and California Conference of Directors of Environmental Health.

## 1. Background

Many nail salon products contain chemicals that can be harmful to the health and safety of salon workers and their customers. When the number of products used simultaneously in a nail salon and the long work hours are considered, salon workers may experience significantly greater chemical exposures than the general public. Most nail salon workers are low-income, minority, women of child-bearing age who are not native speakers of English. Their customers may include children, pregnant women, and women of child-bearing age. Although generally exposed for shorter periods of time, nail salon customers are also at risk of exposure to toxic chemicals that can be released from the nail products.

In 2012, DTSC conducted limited testing of nail products and published the results.<sup>1</sup> Many of the nail products DTSC sampled were found to contain dibutyl phthalate (DBP) and toluene, two chemicals that can interfere with the growth, development, or health of children. DBP is a reproductive and developmental toxicant that can be especially harmful to pregnant women. Toluene, a solvent found in nail polish, is a developmental and neurological toxicant that causes headaches, dizziness, and nausea, among other symptoms. Formaldehyde, a chemical that acts as a disinfectant and as a preservative in nail polishes, is a known carcinogen. Short term exposure to formaldehyde can irritate the eyes, nose, throat, and skin. Long term exposure to formaldehyde can cause asthma. Some nail products tested at the time were also found to contain endocrine disrupting chemicals, which can cause harm at very low levels; some of these chemicals may enter the body through the skin or cuticle.

In response to concern about chemical exposures to nail salon workers and their customers, the California Healthy Nail Salon Collaborative started its Healthy Nail Salon campaign in 2009 and, soon thereafter, established the first HNSR program with the support of San Francisco Department of Environment. Currently, five local jurisdictions in California, including the City and

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<sup>1</sup> ["Summary of Data and Findings from Testing of a Limited Number of Nail Products";](https://www.dtsc.ca.gov/PollutionPrevention/upload/NailSalon_Final.pdf) DTSC, 2012. Available at: [https://www.dtsc.ca.gov/PollutionPrevention/upload/NailSalon\\_Final.pdf](https://www.dtsc.ca.gov/PollutionPrevention/upload/NailSalon_Final.pdf)

County of San Francisco, San Mateo County, County of Santa Clara, City of Santa Monica, and Alameda County have implemented HNSR programs. Outside of California, Healthy Nail Salon programs have also been established in King County, Washington, and in Boston, Massachusetts.

Concerned about the potential for nail salon workers and their customers to be exposed to harmful chemicals found in nail products, the legislature adopted Assembly Bill AB 2125, (Chiu; Stats. 2016, ch. 564), which directs DTSC to establish statewide guidelines for local California jurisdictions interested in voluntarily implementing a HNSR program. The guidelines are intended to promote nail salons that operate safely for workers and consumers.

## 2. Overview

The HNSR program guidelines are established to prevent, minimize, or reduce nail salon workers' and their customers' exposure to toxic chemicals in nail products. They include:

- Criteria and a model implementation plan for cities and counties that adopt a HNSR program;
- A list of specific training topics for salon owners and staff, whether on payroll or contract;
- A list of specific chemical ingredients that should not be used by a nail salon seeking recognition;
- Specific best practices for minimizing exposure to hazardous chemicals;
- Verification that a salon seeking recognition is following applicable regulatory requirements enforced by Cal/OSHA, BBC, local Certified Unified Program Agency (CUPA) under the California Environmental Protection Agency, and DTSC;
- Certification requirements and recommendations;
- A recommended frequency at which the local government agency should verify continued compliance by recognized salons;
- Recommendations on developing and implementing a consumer education program; and
- Model application/initial assessment forms and audit checklists to assist local government agencies that implement a HNSR program.

For certification under these statewide guidelines to be meaningful, the criteria must be implemented consistently across the state. Therefore, while choosing to implement the HNSR program is voluntary, agencies that do so are expected to follow the guidelines. Local agencies that adhere to these guidelines may use the California HNSR program seal. Nail salons that follow

the HNSR program guidelines receive recognition from the local agency that implements a HNSR program in their jurisdiction.

### 3. Benefits of Implementing the Voluntary HNSR Program for Local Government Agencies

- **Reduces worker exposure:** Exposure of nail salon workers to toxic chemicals from nail products is an environmental justice concern. Most salon workers are low-income, minority, non-native English speakers who are women of child-bearing age. They often work long hours and are exposed to multiple chemicals simultaneously in the work environment. Because of the higher frequency and duration, worker exposures are often more significant than home-use exposures. Many nail salon workers are unaware of the hazards of the products they are working with, especially due to language barriers. Establishing a HNSR program will increase salon workers' awareness of the hazards of chemicals that may be released from the products they use and the adverse health and environmental impacts that may result from exposure to these chemicals. The HNSR program promotes the use of safer products, safer work practices, and engineering controls to help reduce nail salon workers' chemical exposure.
- **Protects community health:** Customers receiving nail services in salons are also exposed to toxic chemicals from nail products. Most nail salon customers are women, including women of child-bearing age and pregnant women. Salons certified under the HNSR program guidelines will minimize their customers' exposures to carcinogens, reproductive toxicants, and developmental toxicants.
- **Promotes "green" business principles and practices:** The HNSR program can be a stepping stone to other sustainable, environmentally friendly business practices, including energy conservation and the use of other green products.

### 4. Benefits of Joining the Voluntary HNSR Program for Nail Salons

- **Being a Healthy Nail Salon promotes the business:** Nail salons that adopt the HNSR program and follow the guidelines will receive a sealed certificate issued by the local agency that they can display to customers. Some customers will seek out recognized nail salons that offer safer nail services.
- **Being a Healthy Nail Salon includes positive advertising:** Certified nail salons will be listed on local government websites.

- **Being a Healthy Nail Salon makes the workplace safer and more pleasant:** Exposure of nail salon workers and customers to toxic chemicals from nail products will be reduced. Indoor odors will be reduced.
- **Being a Healthy Nail Salon improves productivity:** Limited studies have shown that nail salon workers who are exposed to chemicals in the salon have adverse health impacts. Therefore, adopting the program may enhance the health and productivity of nail salon workers.

## 5. Healthy Nail Salon Recognition Program Guidelines

The HNSR program guidelines include:

- Implementation plan activities.
- Training topics for nail salon owners and staff.
- A list of chemical ingredients that should not be used by nail salons seeking recognition.
- A list of recommended safer work practices.
- Recommended engineering controls, including specific ventilation practices and equipment.
- Certification requirements and recommendations: The guidelines create a two-tiered certification program to be implemented by local government agencies. Nail salons that meet the minimum requirements for each element of the program are eligible for certification as a Tier-1, Silver Healthy Nail Salon; salons that meet both the minimum requirements and the additional requirements specified for many (but not all) of the program elements are eligible for certification as a Tier-2, Gold Healthy Nail Salon. The following recommendations are **advisory** and do **not** affect the eligibility criteria.
- Verification of nail salons' compliance with applicable regulatory requirements of [BBC](#), local [Certified Unified Program Agency \(CUPA\)](#) under the California Environmental Protection Agency, [Cal/OSHA](#), Fire Code, and DTSC.
- Outreach program/implementation plan materials for local government agencies.
- Consumer education program suggestions to create customer awareness.
- Model forms to assist local government agencies that implement a HNSR program.

## 5.1 Implementation Plan Activities for Local Government Agencies

Establishing a HNSR program is entirely voluntary for local government agencies, and enrolling in the program is voluntary for nail salons. Local government agencies that recognize nail salons under these guidelines are advised to follow the practices specified below for the implementation plan.

**1. Recruitment:** Ideally, local government agencies should assign one or two personnel as HNSR program coordinators to implement a voluntary HNSR program in their county/city.

**2. Research:** HNSR program coordinators should commit time to research the nail salons in their county/city.

- The local government agency should decide whether to limit the recognition program to nail services-only salons or to invite participation by salons that provide other services (e.g., basic hair services including haircut, hair styling; waxing, facials, and eye lash extensions).

However, **salons that provide both nail and chemical hair services (e.g., hair color treatments, other hair chemical treatments, or straightening) should be excluded** from the HNSR program. Many hair products also contain chemicals, such as formaldehyde, that can cause the same or similar health impacts as chemicals found in nail products. Moreover, the health impacts from simultaneous release of hair and nail product chemicals in a confined space, such as a nail salon, are unknown. Therefore, **salons that provide chemical hair services are not eligible for certification** until further research is conducted.

**3. Outreach:** Healthy Nail Salon Recognition Program coordinators should conduct outreach to the salons in their counties and cities to recruit them to the HNSR Program.

- The time required for outreach depends on the number of nail salons in the county/city and the form of outreach. Outreach can be conducted via phone calls, sending letters to salon owners, or door-to-door visits to nail salons. Coordinators of existing HNSR programs have found door-to-door visits to be the most effective way of recruiting salons to join.

**4. Language capability:** Most nail salon workers in California are non-native speakers of English. The native language of these workers is most commonly Vietnamese; a smaller percentage speak Korean, Chinese, and Spanish. While they often lack the resources to do so, local government agencies operating existing HNSR programs have said that assigning staff that speak the language to work on the HNSR program reduces the language barrier.

**5. Information collection:** The HNSR program coordinator should collect information from nail salons that are interested in participating in the HNSR program.

- Information can be collected through the model application forms that are provided in these guidelines; the forms can be returned to HNSR program coordinators electronically or via mail.
- Agencies that prefer not to implement two-tier HNSR program may opt to offer only the Tier-1, Silver Certification in their jurisdictions.
- Agencies that decide to implement both certification tiers should explain the benefits and requirements of each tier to salon owners so that they can make an informed decision about which tier to apply for.
- The HNSR program coordinator should collect information on prospective Healthy Nail Salons' current products and practices including product brands salons use, which local beauty stores, distributors, and manufacturers salons purchase their products from, whether the salon collects Safety Data Sheets (SDSs) of all their products from the supplier, how hazardous waste is disposed of – if any is generated, and whether the salon has ventilation system. This information will be used to determine which of the salon's current products and practices meet program criteria and which need to be updated. It will also help salons decide which certification tier they want to join.

**6. Compliance with Board of Barbering and Cosmetology:** HNSR program coordinators should provide a list of HNSR program applicants with nail salon license numbers to BBC to determine their compliance status. Healthy Nail Salons must maintain compliance with the requirements of the California Board of Barbering and Cosmetology in Chapter 10 of Division 3 of the Business and Professions Code and Article 12 of the State Board of Barbering and Cosmetology regulations.

- HNSR Program coordinators should follow up with salons that violated the California Board of Barbering and Cosmetology in Chapter 10 of Division 3 of the Business and Professions Code and Article 12 of the State Board of Barbering and Cosmetology regulations and ensure they correct violations by a specified date.
- HNSR program coordinators should check the BBC quarterly report to ensure certified salons do not have new violations. Ongoing compliance with all applicable BBC regulations is required for a salon to maintain its Healthy Nail Salon recognition certificate.

**7. Salon visits:** HNSR program coordinators should commit time for multiple visits to prospective Healthy Nail Salons:

- An initial visit to interested salons to meet with the salon’s owners to inform them about the HNSR program and encourage them to join (initial assessment and application model form is provided in Appendix C);
- A follow-up visit to train the salon’s owners and staff and conduct an initial assessment of the salon’s practices (an example initial salon visit and training form is provided in Appendix D);
- Another follow-up visit to inspect and to certify the salon (audit checklist model forms to certify salons are provided in Appendices E and F);
- Further visits if the salon needs to correct issues or code violations in order to be certified; and
- Annual visits to verify the salon’s ongoing compliance with the conditions of certification (audit checklist model forms for annual visits are provided in Appendices E and F) when salon owner is present.

It is highly recommended to conduct the annual visits **unannounced**. However, nail salon owners do not have regular schedules, and HNSR program coordinators may need to conduct multiple salon visits to complete an audit with the salon owner present. Therefore, when resources are limited, HNSR program coordinators may choose to coordinate with salon owners in advance to prevent multiple salon visits for the annual audit.

**8. Training:** HNSR program coordinators should plan time during salon visits to provide training for salon owners and staff.

- Topics for the initial training session for salons that have applied for certification are listed in this document, and material will be provided to HNSR program coordinators by DTSC. Training sessions should be held at the nail salon, and the HNSR program coordinator should ensure the majority of nail salon staff is available to attend. If some of the staff is not present at the initial training, HNSR program coordinators may need to schedule a follow-up session to ensure everyone is trained. It is recommended that training be scheduled before or after business hours when there are no clients in the salon or, if that isn’t feasible, during the slowest times of the work week.
- Because nail salons may have a high staff turnover rate, HNSR program coordinators should schedule an annual refresher training session for all salon staff, including any new hires. All salon staff should complete the annual refresher training before the salon is recertified.

**9. Implementation:** HNSR program coordinators should ensure the following steps are completed prior to certifying a salon:

- Perform a post-training assessment to ensure all salon staff are trained and thoroughly understood the training material.
- Conduct a salon visit to verify that the salon is using safer nail products as specified in the guidelines.
- Contact BBC to verify the salon has no violations.
- Perform a final walkthrough in the salon when the salon owner is present to ensure safer work practices are followed by salon staff.

**10. Implementation alternatives:** The HNSR program has two tiers of certification, each with its own requirements. HNSR program coordinators may choose to implement solely Tier-1, Silver Certification in their jurisdictions. If a local government agency decides to implement both certification tiers, the HNSR program coordinator should inform salon owners of different certification options and determine which tier the salon is interested in joining.

- Nail salons that meet the minimum requirements for each step in the HNSR program guidelines will be issued a Tier-1, Silver Healthy Nail Salon Certificate.
- Nail salons that meet both the minimum requirements and the additional requirements for each step in the HNSR program guidelines will be issued a Tier-2, Gold Healthy Nail Salon Certificate.

**11. Certifying the salons:** HNSR program coordinators should schedule a visit to certify a salon after the initial assessment and training of salon staff has been completed. The HNSR program coordinator should:

- Schedule the certification visit at a time when the salon owner will be present;
- Use the audit checklists found in Appendices E and F to this document to certify the salon (Each certification tier has its own checklist).
- Schedule a follow-up audit visit for salons that need to correct any issues before they can be certified.

**12. Certification compliance visits:** Once a year, the HNSR program coordinator should schedule a visit to each participating Healthy Nail Salon to verify its compliance with the certification requirements. It is highly recommended to conduct the annual visit **unannounced**. Even though this is a voluntary program, a nail salon must continue following the HNSR guidelines in order to

maintain its status as a Healthy Nail Salon. These annual visits will determine whether the salons maintain their Healthy Nail Salon certification or are decertified. For the annual compliance visits, the HNSR program coordinator should:

- Bring an audit checklist (Appendices E and F) to the salon visit to ensure a salon is following the HNSR program guidelines.
- Set a specified date for a follow-up visit to salons that need to correct issues and verify corrective actions are taken by the salon.
- Decertify salons that do not follow the HNSR program guidelines and do not take any action to correct issues by the specified date.

**13. Creating customer awareness:** Local agencies implementing a HNSR program may wish to take one or more of the steps outlined below to create customer awareness and to promote Healthy Nail Salons at no cost to salon owners:

- List the Healthy Nail Salons on their county/city websites.
- Promote the HNSR program via social media, bus stop advertisements, brochures, etc.
- Host local events to create customer awareness about Healthy Nail Salons.

A suggested implementation plan for local government agencies is provided in Appendix B.

## 5.2 Training for Salon Owners and Staff

Nail salon owners and workers must complete the HNSR program training provided by the local government agency to be certified under this program. This training is essential to ensure that salon staff understand and comply with these guidelines and maintain a Healthy Nail Salon.

## 5.3 A List of Specific Chemical Ingredients that Should Not Be Used by Nail Salons Seeking Recognition

A Healthy Nail Salon should avoid using the nail products that contain the chemicals discussed in this section.

- Healthy Nail Salons should choose nail polishes, lacquers, base coats, top coats, gel polishes, and other products that do not contain dibutyl phthalate (DBP), toluene, or formaldehyde (sometimes referred as the “toxic trio”).

**Dibutyl phthalate (DBP)** is a developmental toxicant and can be harmful to pregnant women. The primary route of human exposure to DBP from nail products is dermal.

Exposure to DBP causes eye, skin, nose, mouth, and throat irritation; and nausea. Long term exposures may cause adverse impacts on the reproductive and endocrine systems, degeneration of liver cells, and kidney failure.

**Toluene** is a volatile chemical with potential inhalation exposure to humans via indoor air. Exposure to toluene may cause headaches; dizziness; numbness; dry or cracked skin; a sleepy/tired feeling; lightheadedness; and irritation to the eyes, nose, throat, and lungs. Long term exposures may cause memory loss, confusion, loss of appetite, harm to unborn children during pregnancy, birth defects, reproductive harm, developmental toxicity, and neurotoxicity.

**Formaldehyde** is a volatile chemical with potential inhalation exposure to humans via indoor air. Exposure to formaldehyde may cause difficulty in breathing; coughing; asthma-like attacks; headaches; dizziness; wheezing; and eye, nose, skin, and throat irritation. Long term exposure may cause allergic skin rash and dermatitis. Formaldehyde is a known carcinogen, respiratory toxicant, and ocular toxicant.

- Healthy Nail Salons should avoid using nail polish thinners unless absolutely necessary. Healthy Nail Salons that opt to use thinners, should not use thinners that contain toluene or methyl ethyl ketone (MEK).

**Methyl ethyl ketone (MEK):** Exposure to MEK may cause eye, nose, throat, and skin irritation. Long term exposure may cause dry, red or cracked skin, and dermatitis. High concentrations can cause headaches, nausea, dizziness, drowsiness, and confusion.

- Healthy Nail Salons should choose nail polish removers that do not contain ethyl acetate or butyl acetate.

**Ethyl acetate:** Exposure to ethyl acetate may cause eye, throat, and skin irritation; dizziness; drowsiness; headaches; nausea; weakness; and unconsciousness. Long term exposure of pregnant women can result in *in utero* exposure of the fetus, causing birth defects and low birth weight, as well as later biological and behavioral problems as the child grows. Long term exposures to ethyl acetate can damage the nervous system, including the brain.

**Butyl acetate:** Exposure to butyl acetate may cause eye, throat, and skin irritation; dizziness; headaches; and nausea. Long term exposure of pregnant women can result in *in utero* exposure of the fetus, causing birth defects and low birth weight, as well as later biological and behavioral problems as the child grows. Long term exposures to butyl acetate can damage the nervous system, including the brain.

- Healthy Nail Salons should choose artificial nail products, nail polishes, and gel nail products that do not contain liquid methyl methacrylate (MMA) monomer.

**Methyl methacrylate (MMA):** Exposure to MMA can cause eye, skin, nose, and respiratory irritation; loss of smell; headaches; memory loss; difficulty in concentrating; and numbness. Long term exposure can cause asthma-like attacks, skin and respiratory sensitization, and contact dermatitis. MMA was banned by U.S. Food and Drug Administration (FDA) in artificial nail products. Although MMA was banned, there are MMA-containing nail products still present in the market. Having MMA on the premises is a violation of the California Board of Barbering and Cosmetology in Chapter 10 of Division 3 of the Business and Professions Code and Article 12 of the State Board of Barbering and Cosmetology regulations and is subject to enforcement by BBC.

## 5.4 A List of Recommended Safer Work Practices

Chemical exposure of salon workers can be reduced by following the safer work practices listed below:

- Using proper personal protective equipment (PPE) to reduce chemical exposure of salon workers when providing nail services, transferring and handling chemicals, and disposing chemical waste.
- Following safe practices when handling, transferring, and storing chemicals to reduce chemical exposure of salon workers.
- Disposing of chemical waste properly to reduce chemical exposure and minimize indoor odor in the salon.
- Improving work habits to minimize/reduce chemical exposure of salon workers.

## 5.5 Recommended Engineering Controls Including Specific Ventilation Practices and Equipment

Nail salon employees and customers are regularly exposed to hazardous chemicals in the form of dust or vapor from nail services, especially when nail technicians are performing artificial nail services. These services can cause respiratory and neurological problems such as asthma-like attacks, coughing, wheezing, headaches, and dizziness. Chemical exposure and the development of these health problems can be reduced through proper ventilation in the nail salon. Proper salon ventilation can significantly reduce chemical vapors and dust in salon air. Therefore, salons should adopt proper ventilation practices including letting fresh air into the salon (e.g., opening doors/windows) and using available ventilation in the salon (e.g., turning on window/ceiling

fans). In addition, salons can install ventilation systems such as local exhaust ventilation (LEV) systems to further reduce chemical exposure.

## 5.6 Certification Requirements and Recommendations

Requirements	Recommendations			
	Requirements and recommendations for Tier-1, Silver Certification and Tier-2, Gold Certification are summarized in table below. Salons must meet Tier 1, Silver certification requirements to be certified as a Silver Healthy Nail salon. Salons must meet both Tier 1, Silver and Tier 2, Gold certification requirements to be certified as a Gold Healthy Nail Salon. In addition to the requirements, the table includes additional recommendations which are <b>advisory</b> and <b>do not</b> affect the eligibility criteria.			
	<b><u>Tier-1, Silver Certification</u></b>			
	1. Comply with BBC, Cal/OSHA, and any applicable local business regulations.			
	2. Complete training.			
	3. Use safer nail products.			
	4. Adopt safer work practices.			
	4.1. Wear personal protective equipment (PPE):			
	<ul style="list-style-type: none"> <li>Wear proper PPE when necessary (e.g., gloves and N95 dust masks) (See page 16, Step 4.1 for details)</li> </ul>			
	<ul style="list-style-type: none"> <li>Wear safety glasses/goggles when handling chemicals.</li> </ul>			
	<input checked="" type="checkbox"/> <ul style="list-style-type: none"> <li>Wear long sleeves and cover legs to prevent direct skin contact with chemicals and acrylic dust.</li> </ul>			
	4.2. Follow safe practices when handling transferring, and storing chemicals.			
	4.3. Follow requirements for safe chemical waste disposal.			
	4.4. Adopt safer work habits.			
	<input checked="" type="checkbox"/> <ul style="list-style-type: none"> <li>Wash work clothes separately from other clothes.</li> </ul>			
	5. Follow BBC regulations for salon sanitation and tool/equipment cleaning.			
	6. Implement proper ventilation.			
	<ul style="list-style-type: none"> <li>Open doors/windows to let in fresh air when possible.</li> </ul>			
	<ul style="list-style-type: none"> <li>If salon has window/ceiling fan, ensure it is turned on and working.</li> </ul>			
	<ul style="list-style-type: none"> <li>Exhaust salon indoor air to outdoors through doors/windows, fans, or ventilation.</li> </ul>			
	<ul style="list-style-type: none"> <li>Salons that provide acrylic nail services must designate a well-ventilated area for acrylic nail services and install a local exhaust ventilation (LEV) system.</li> </ul>			
	<b><u>Tier-2, Gold Certification:</u></b>			
	<ul style="list-style-type: none"> <li>Install one of the listed ventilation systems:</li> </ul>			
	<table border="1"> <tr> <td>6.a. A heating, ventilation, and air conditioning (HVAC) system</td> <td>6.b. An LEV system</td> <td>6.c. A downdraft ventilated nail table that exhausts salon indoor air to outside</td> </tr> </table>	6.a. A heating, ventilation, and air conditioning (HVAC) system	6.b. An LEV system	6.c. A downdraft ventilated nail table that exhausts salon indoor air to outside
6.a. A heating, ventilation, and air conditioning (HVAC) system	6.b. An LEV system	6.c. A downdraft ventilated nail table that exhausts salon indoor air to outside		
	<ul style="list-style-type: none"> <li>Keep ventilation systems on during work hours.</li> </ul>			
	<ul style="list-style-type: none"> <li>Clean/change filters of all ventilation systems per manufacturer’s manual.</li> </ul>			
	<ul style="list-style-type: none"> <li>Check air flows regularly for all ventilation systems per manufacturer’s manual.</li> </ul>			
	Wear safety glasses/goggles when handling chemicals and providing nail services (e.g., nail clipping, filing, and acrylic applications).			
	<input checked="" type="checkbox"/> <ul style="list-style-type: none"> <li>Salons that do not have a HVAC system are recommended to install a window fan, if possible.</li> </ul>			

<input checked="" type="checkbox"/>	<ul style="list-style-type: none"> <li>Salons that opt to use a LEV system are recommended to have individual LEV systems to use for each nail station, if possible.</li> </ul>
<input checked="" type="checkbox"/>	7. Follow ergonomic practices to improve worker comfort and efficiency.
<input checked="" type="checkbox"/>	8. Adopt environmentally friendly practices e.g., waste reduction, water conservation.

- A salon is eligible for certification as a Tier-1, Silver Healthy Nail Salon when the salon meets the minimum requirements described in detail below.
- A salon is eligible for certification as a Tier-2, Gold Healthy Nail Salon if the salon meets both the minimum requirements and the additional requirements described in detail below.

### STEP 1. BASIC COMPLIANCE

#### **⚠ Minimum Requirements for Both Tier-1, Silver Healthy Nail Salon Recognition Certificate and Tier-2, Gold Healthy Nail Salon Recognition Certificate:**

A Healthy Nail Salon must maintain compliance with the applicable requirements of:

1. The State Board of Barbering and Cosmetology (BBC);
2. The Division of Occupational Safety and Health (DOSH, also known as Cal/OSHA);
3. The hazardous waste generator standards in Chapter 6.5 of the Health and Safety Code and Title 22 of the California Code of Regulations;
4. Any applicable local business, fire, and zoning requirements.

### STEP 2. TRAINING TOPICS FOR NAIL SALON OWNERS AND STAFF

#### **⚠ Minimum Requirements for Both Tier-1, Silver Healthy Nail Salon Recognition Certificate and Tier-2, Gold Healthy Nail Salon Recognition Certificate:**

Before certifying a salon as a Healthy Nail Salon, the HNSR program coordinator should provide training to salon owners and staff on the following topics:

1. The hazard traits of chemicals commonly found in nail products.
2. The benefits of joining the HNSR program.
3. Choosing safer nail products to use in salons.
4. Safe work practices.
5. Safe handling, storing, and disposing of chemicals.

6. Using proper personal protective equipment (PPE).
7. Using engineering controls; proper ventilation.
8. The definition of Safety Data Sheets (SDS) and instructions on how to read one.
9. Information on the types of hazardous wastes that may be generated in salons and how to manage them properly.
10. Proper BBC tool cleaning practices.
11. Other environmentally friendly practices (e.g., waste reduction, energy conservation, water conservation, recycling, and pollution prevention).
12. Ergonomic practices.
13. How to register and apply to the HNSR program.

### STEP 3. SAFER NAIL PRODUCTS

Some products that are used in nail salons contain chemicals that can cause adverse health impacts to nail salon workers. Salon workers may breathe chemical vapors, dust, and mists, get products on their skin or in their eyes, or swallow products if they have contact with food or drinks.

Salon workers are exposed to multiple chemicals at the same time because they and their coworkers may use several products concurrently in a confined indoor space. Many nail technicians work long hours, which increases the duration of their chemical exposure. Depending on the chemical, these exposures can make salon workers sick immediately (acute toxicity) or cause adverse health impacts over time (chronic toxicity).

A Healthy Nail Salon should choose nail products that avoid the chemicals identified below.

**⚠️ Minimum Requirements for Both Tier-1, Silver Healthy Nail Salon Recognition Certificate and Tier-2, Gold Healthy Nail Salon Recognition Certificate:**

1. Healthy Nail Salons should choose nail polishes, lacquers, base coats, top coats, gel polishes, and other products that do not contain dibutyl phthalate (DBP), toluene, or formaldehyde (also known as the “[toxic trio](#)”).

#### USE LESS TOXIC PRODUCTS

*By choosing less toxic, safer nail products, Healthy Nail Salons reduce the exposure of salon workers and customers to harmful chemicals, including carcinogens, reproductive toxicants, and developmental toxicants.*



2. Healthy Nail Salons should avoid using nail polish thinners unless absolutely necessary. Healthy Nail Salons that opt to use thinners, should not use thinners that contain toluene or methyl ethyl ketone (MEK).
3. Healthy Nail Salons should choose nail polish removers that do not contain ethyl acetate or butyl acetate.
4. Healthy Nail Salons should choose artificial nail products, nail polishes, and gel nail products that do not contain liquid methyl methacrylate (MMA) monomer.
5. Healthy Nail Salons should not allow customers to bring in products unless they meet the program criteria.

*Note: While the chemicals listed above have known hazard traits, DTSC has not identified specific alternatives to these chemicals that are necessarily safer. Comprehensive alternative assessments would be needed to confidently identify safer alternatives to these chemicals.*

#### STEP 4. SAFER WORK PRACTICES

Inhalation, ingestion, and skin absorption are the three common routes of exposure of nail salon workers to chemicals. Chemical exposure of salon workers can be reduced by following safer work practices.<sup>2</sup>

##### STEP 4.1. PROPER PERSONAL PROTECTIVE EQUIPMENT

Using proper personal protective equipment (PPE) can reduce the chemical exposure of nail salon workers when providing nail services, transferring and handling chemicals, and disposing of chemical waste.

Healthy Nail Salon workers should use proper PPE as described below.

#### **⚠ Minimum Requirements for Tier-1, Silver Healthy Nail Salon Recognition Certificate:**

Local government agencies implementing a HNSR program should verify that salons applying for Tier-1, Silver certification recognition ensure that their workers:

1. Follow the salon’s written policy to wear proper PPE when necessary.

**USE PPE**

*Using proper PPE can minimize chemical exposure of nail salon workers.*



<sup>2</sup> A summary of safer work practices for nail salons can be found in Cal/OSHA’s Safety and Health Fact Sheet, “Working Safely in Nail Salons” ([http://www.dir.ca.gov/dosh/dosh\\_publications/Nail-Salon-Safety-fs.pdf](http://www.dir.ca.gov/dosh/dosh_publications/Nail-Salon-Safety-fs.pdf), accessed November 20, 2017).

2. Ensure that nail technicians wear safety glasses or goggles when handling chemicals.
3. Wear the appropriate type of disposable gloves when handling/transferring chemicals and providing nail services. Wear nitrile gloves when handling nail products. Wear latex or neoprene gloves when handling acetone.<sup>3</sup>
4. Do not reuse disposable gloves.
5. Replace gloves immediately if there are cuts, tears, or holes in them.
6. Change gloves after each customer.
7. Do not continue using a product if there are visible signs of skin irritation. Examine gloves to make sure your skin is properly protected.
8. Do not use surgical masks. Surgical masks do not protect workers from breathing chemical vapors/gases and particulates.

9. Salon owners must evaluate the workplace<sup>4</sup> to determine whether respirator use is necessary to protect worker health<sup>5</sup> and provide NIOSH-approved N95 respirator dust masks to prevent worker exposure to dust when buffing/filing nails, and providing acrylic nail services. It should be noted that NIOSH-



Surgical masks



N95 respirator dust masks



<sup>3</sup> Although latex gloves provide a better resistance to acetone than neoprene gloves, latex may cause allergic reactions for some people.

<sup>4</sup> The Cal/OSHA Safety and Health Fact Sheet, “Respiratory Protection,” links to the Cal/OSHA regulation for worker use of respirators in Title 8, California Code of Regulations (T8CCR), Section 5144, and its appendices. ([http://www.dir.ca.gov/dosh/dosh\\_publications/respiratory-protection-fs.pdf](http://www.dir.ca.gov/dosh/dosh_publications/respiratory-protection-fs.pdf), accessed November 20, 2017).

<sup>5</sup> “Respiratory Protection in the Workplace, A Practical Guide for Small-Business Employers” ([https://www.dir.ca.gov/dosh/dosh\\_publications/respiratory.pdf](https://www.dir.ca.gov/dosh/dosh_publications/respiratory.pdf), accessed November 20, 2017) is provided by Cal/OSHA. A written respiratory protection program is not required when employees request the use of filtering facepiece-type respirators (dust masks) and when the respirators are not used to control a respiratory hazard. Employers must provide employees only with the information in T8 CCR, Section 5144, Appendix D, “(Mandatory) Information for Employees Using Respirators When Not Required Under the Standard.” If a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker, as stated in T8 CCR, Section 5144, Appendix D (<https://www.dir.ca.gov/title8/5144d.html>, accessed November 20, 2017).

approved N95 respirator dust masks do not protect workers from chemical vapors and gases.

**⚠ Additional Requirements for Tier-2, Gold Healthy Nail Salon Recognition Certificate:**

In addition to the minimum requirements listed above, a local government agency implementing a HNSR program should verify that salons applying for Tier-2, Gold certification do all of the following:

10. Ensure that nail technicians wear safety glasses or goggles when handling chemicals and providing nail services. Safety glasses/goggles protect eyes from chemical splashes, particles from nail clipping and nail filing, and acrylic dust.



Safety glasses



Goggles

**✓ Recommendations for Both Tier-1, Silver Healthy Nail Salon Recognition Certificate and Tier-2, Gold Healthy Nail Salon Recognition Certificate:**

It is highly recommended that nail technicians wear long sleeves and cover their legs (with pants or skirts at least knee-length) to prevent direct skin contact with chemicals and acrylic dust. A work uniform such as lab coat-style clothing with long sleeves may substitute for long-sleeved clothing and long pants/skirts.

**HANDLE CHEMICALS SAFELY**

*Handling and storing chemicals safely can significantly reduce the chemical exposure of nail salon workers.*



**STEP 4.2. HANDLING/STORING CHEMICALS SAFELY**

Following safe practices when handling, transferring, and storing chemicals can reduce chemical exposure of nail salon workers.

Occupational Safety and Health Administration (OSHA) requires nail salons to make Safety Data Sheets (SDSs) available to their workers and require nail product manufacturers to provide SDSs to salon owners. A Healthy Nail Salon must comply with the applicable OSHA requirements related to SDSs:

**⚠ Minimum Requirements for Both Tier-1, Silver Healthy Nail Salon Recognition Certificate and Tier-2, Gold Healthy Nail Salon Recognition Certificate:**

1. All Healthy Nail Salon owners should obtain SDSs for all salon products from local beauty supply stores or product manufacturers. (The HNSR program coordinator may help salons obtain product SDSs.) The local government agency implementing a HNSR program

should verify that salons applying for recognition have compiled the product SDSs in a binder. (During your annual inspection, verify that the salon is updating SDSs as soon as they receive them or at least once a year to keep them current.)

2. Salon owners should read and understand SDSs for nail salon products and ensure salon staff can conveniently access them.
3. Employers<sup>6</sup> are required to provide information and training to all workers who work with the products about the potential hazards, how to use the products safely, and how to respond in case of an emergency.
4. Salon workers should be trained on how to read labels/instructions, and should be instructed to always read labels and follow their instructions when handling products.
5. Salon workers should be instructed to label containers used to transfer chemicals from larger containers to smaller bottles. Both containers should also be clearly labeled with their contents and associated hazards<sup>7</sup> to prevent errors and inadvertent exposures.
6. Salon workers should be instructed to transfer chemicals from large bottles to small bottles in a well-ventilated area that is away from sources of ignition. If possible, doors and windows should be opened during such transfers. Salon workers should be instructed to wear safety glasses/goggles and proper gloves when transferring chemicals.
7. Salon workers should be instructed to close containers of nail salon products when not in use.

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<sup>6</sup> In some cases, salon workers are considered independent contractors rather than employees of the salon. In such cases, the workers themselves may be responsible for providing this information (<https://www.osha.gov/SLTC/nailsalons/>, accessed September 11, 2017). Nevertheless, a Healthy Nail Salon should provide this information and training to its workers whether they are employees or contractors.

<sup>7</sup> Associated hazards of chemicals should be added on the labels with appropriate hazard warnings (e.g., a sticker with the National Fire Protection Association diamond) or words/pictures/symbols to provide necessary information to salon staff for safe handling of products.

8. Salon workers should be instructed to pour an appropriate quantity of chemical for daily use into a closed dispenser bottle, and not to keep extra products in large containers at workstations.
9. All Healthy Nail Salons should designate an area to store chemicals that is away from heat and ignition sources. Many chemicals are flammable and can easily catch fire.

Products found in nail salons that may contain flammable chemicals include:

- Nail finishes (primers, polishes, sealers, and hardeners)
- Adhesives for nail tips
- Acrylic liquid
- Acetone
- Nail polish removers
- Dehydrator
- Acid free primers
- Spray can-electric file cleaner
- Acrylic resin solvent to clean brushes
- Cleaners for countertops

10. Healthy Nail Salons should not store large chemical bottles at workstations.
11. Healthy Nail Salons should not store or transfer chemicals close to areas where food and drinks are stored.
12. Healthy Nail Salons should comply with all applicable Fire Code requirements to prevent fire hazards.

#### STEP 4.3. PROPER CHEMICAL WASTE DISPOSAL

Nail salons should follow requirements for safely disposing of used chemicals. Nail salons generate wastes that need to be properly disposed of. Many nail salon products have properties (e.g., toxicity or flammability) that make them hazardous waste when they are no longer needed. All nail salons must manage these unwanted products in compliance with California's hazardous waste regulations. The regulations require a person who generates a waste to determine whether it is a hazardous waste based on criteria in Title 22, Chapter 12 of Division 4.5, Section 66262.11 of the California Code of Regulations and criteria for identifying the characteristics of hazardous waste in Title 22, Chapter 11 of Division 4.5, Section 66261.10 of the California Code of Regulations. Below is a non-exhaustive list of wastes commonly generated by nail salons that **may** be classified and regulated as hazardous wastes:

- Unused nail polish or nail polish thinner (especially if the product is still wet in the container)
- Unused nail polish removers
- Unused acrylic nail powder and liquid

- Unused fingernail glue
- Unused nail primer
- Cotton balls that are soaked with acetone, nail polish, or other products, particularly if still wet
- Acetone-soaked cotton balls from any nail extension treatment (acrylic, silk wraps, and gel polish)
- Soaking or spilled liquid acetone
- Soaking or spilled barbicide that is used for disinfecting tools and materials
- Disinfectants that are used as cleaning agents to wipe surfaces, basins, and drains

A nail salon that generates hazardous wastes must manage them according to applicable hazardous waste generator requirements. In California, both DTSC and the local Certified Unified Program Agency (CUPA) have the authority to enforce hazardous waste statutes and regulations.<sup>8</sup> Most commonly, the CUPA is the city or county environmental health department or fire department. Whether the CUPA in your jurisdiction is housed in the same agency that implements the HNSR program or in another city or county department, it is important to contact the CUPA to determine the compliance status of any salon applying for recognition as a Healthy Nail Salon. Salons with active or unresolved enforcement cases related to hazardous waste violations should not be certified until all violations have been resolved. The local government agency implementing a HNSR program should re-verify a salon’s compliance with hazardous waste generator requirements during annual recertification.

**ALL NAIL SALONS MUST DISPOSE OF UNWANTED PRODUCTS PROPERLY**

*Certain unwanted nail salon products are considered hazardous waste. Salons that generate hazardous waste must follow California’s hazardous waste generator requirements.*



**⚠️ Minimum Requirements for Both Tier-1, Silver Healthy Nail Salon Recognition Certificate and Tier-2, Gold Healthy Nail Salon Recognition Certificate**

1. Any nail salon that generates hazardous waste must accumulate it in closed containers that are properly labeled.

<sup>8</sup> DTSC issues state ID numbers for **hazardous** waste generators. **If you need an ID number, you can obtain one at <http://www.dtsc.ca.gov/IDManifest/>.** Temporary ID numbers are issued to businesses that do not typically generate hazardous waste. Permanent ID numbers are issued to businesses that routinely generate hazardous waste.

2. Nail salons must not accumulate hazardous waste longer than the applicable generation time limits specified in the regulations.
3. Nail salons must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures.
4. Nail salons must send or take hazardous waste only to an authorized facility. They may not dispose of hazardous waste in the trash or down the drain.
5. The statute allows generators of a small quantity of hazardous waste to transport it themselves. Many local jurisdictions have a hazardous waste collection program that accepts waste from these Conditionally Exempt Small Quantity Generators (CESQGs). To be eligible, a salon must generate no more than 220 pounds, or 27 gallons, of hazardous waste per month. In some cases, the local government agency implementing a HNSR program may also operate the local CESQG program; in others, that program may be under the jurisdiction of another city or county agency. In either case, an agency implementing the HNSR program should ensure that applicants for recognition are aware of the local CESQG program, if one exists, and that the salon properly manages any nail product it is getting rid of to obtain recognition under this program.

Salons seeking recognition under the HNSR program will likely need to dispose of products that do not meet the program’s criteria as specified in these guidelines; some of these products will likely be hazardous wastes and will need to be managed properly.

#### STEP 4.4. IMPROVING WORK HABITS

Adopting safer work habits can minimize chemical exposure of nail salon workers. Local government agencies implementing a HNSR program should ensure that participating salons follow the safer work practices specified below.

**⚠ Minimum Requirements for Both Tier-1, Silver Healthy Nail Salon Recognition Certificate and Tier-2, Gold Healthy Nail Salon Recognition Certificate**

1. Technicians should always wash hands with soap and water before and after working with clients; after handling/transferring chemicals; and before eating, drinking, applying cosmetics, and smoking.
2. Healthy Nail Salons should provide clean towels for each customer.

**ALL NAIL SALONS SHOULD ADOPT SAFER WORK PRACTICES**

*Wash hands with mild soap and water before/after providing services and handling chemicals to minimize chemical exposure. Have designated areas for food/drinks other than work areas.*



3. Technicians should not eat, drink, store food, or smoke in work areas.
4. Technicians should always keep food and drinks covered.
5. Healthy Nail Salons should designate an area for eating and drinking that is separate from work areas.
6. Nail technicians should bandage/cover all open cuts or wounds on their skin.
7. Nail technicians should not use clients' personal tools.
8. Nail technicians should not re-use non-metal tools and should discard them immediately after use on a single client. Non-metal tools include, but are not limited to:
  - Nail files/emery boards
  - Buffers
  - Buffing discs on electric files
  - Wood cuticle sticks
  - Toe separators
  - Pumice stones
  - Gloves
  - Cotton pads/sponges
9. Nail technicians should avoid breathing chemical vapors, dust, and particles (i.e., particles containing chemicals from nail polishes or acrylics that can be inhaled) by using appropriate personal protective equipment, ventilation, or both. N95 respirator dust masks may reduce exposure to dust and particles, but they provide no protection from exposure to chemical vapors.

 **Recommendations for Both Tier-1, Silver Healthy Nail Salon Recognition Certificate and Tier-2, Gold Healthy Nail Salon Recognition Certificate**

Nail technicians should wash work clothes separately from other clothes to prevent salon dust and chemicals from spreading to the other clothes.

**STEP 5. PROPER VENTILATION**

Local government agencies implementing a HNSR program should ensure that participating salons implement the following practices to ensure proper ventilation:

 **Minimum Requirements for Tier-1, Silver Healthy Nail Salon Recognition Certificate**

1. The salon should open doors and windows when possible to let in fresh air.
2. If the salon has a ventilation system in the ceiling or walls, or a ceiling or window fan, the salon owner should ensure it is turned on and working.
3. The salon should exhaust indoor air to the outdoors through doors/windows, fans, or ventilation.
4. A salon that provides acrylic nail services should designate a well-ventilated area solely for acrylic nail services and install a local exhaust ventilation (LEV) system.

### IMPLEMENT PROPER VENTILATION

*Using proper ventilation systems and opening doors/windows to allow fresh air into the salon can significantly reduce chemical exposure of salon workers and customers.*



### **⚠ Additional Requirements for Tier-2, Gold Healthy Nail Salon Recognition Certificate**

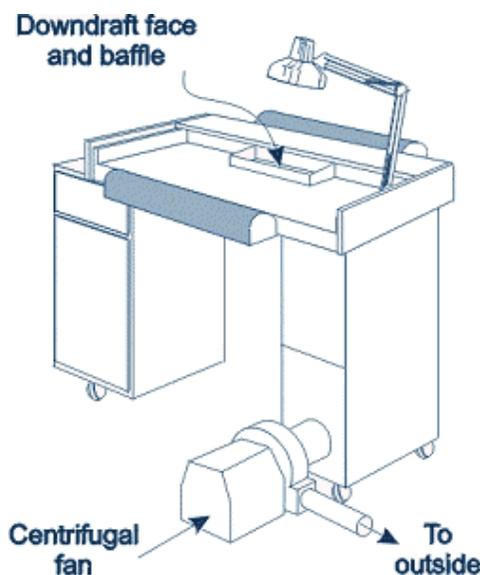
Local government agencies implementing a HNSR program must ensure that salons seeking Tier-2, Gold certification implement the following additional practices:

5. Salons seeking Tier-2, Gold certification must install at least one of the following ventilation systems:
  - 5.a. A heating, ventilation, and air conditioning (HVAC) system. If the salon is rented out of a larger building, the salon owner should check with the building manager prior to installation; or
  - 5.b. An LEV system in the salon. These practices should be followed when using it:
    - Locate the LEV intake close to the client's and the technician's hands.
    - Do not exhaust close to the salon doorway.
    - Replace or clean dust/particulate filters regularly. High Efficiency Particulate Air (HEPA) filters are recommended for particulates; activated charcoal filters are recommended for vapor capture.
    - Make sure that fans used solely for cooling should not have stronger air flow than nearby LEV systems to prevent disruption of exhaust.

LEV systems capture and remove contaminants at the source and thereby protect the breathing zone of both the technician and the client. See Appendix A for suggestions of LEV systems;<sup>9</sup> or

**5.c.** A downdraft ventilated nail table that exhausts indoor salon air to the outside. If downdraft ventilated nail tables are used, nail salons should:

- Make sure the table is turned on while nail services are provided.
- Ensure the downdraft face and baffle are not covered with a cloth or towel while providing nail services.
- Raise the client's side of the table to allow the client's hands to rest closer to the vent.
- Change the charcoal filters according to the manufacturer's recommendation.
- Clean out the catch basin at least once a week or more, depending on the number of clients served each day.



6. Keep the ventilation systems on during work hours.
7. Clean/change filters of all ventilation systems regularly as specified by the vendor.
8. Check air flows regularly to ensure they are sufficient for all ventilation systems as specified by the vendor.
9. Ensure the ventilation intake is located at least 15 feet away from the exhaust to prevent recirculation of contaminated air into the salon.
10. Provide enough makeup air to replace the exhausted air to prevent drafts and negative pressure.

**Recommendations for Tier-2, Gold Healthy Nail Salon Recognition Certificate**

1. Salons that do not have a HVAC system (e.g., that use a LEV system to meet requirement 5.b) are advised to install a window fan, if possible.

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<sup>9</sup> It is highly recommended that nail salon owners coordinate with the manufacturer to choose the proper LEV system for their salons. Local government agencies may assist nail salons to evaluate a proper LEV system for their salons by working with a certified industrial hygienist.

2. Salons that opt to use a LEV system to meet Tier-2, Gold certification requirement 5.b are advised to have individual LEV systems for each nail station, if possible.

## STEP 6. SANITATION

Healthy Nail Salons must provide services in a clean environment and ensure the tools are properly cleaned for the health and safety of clients and salon workers.

### **⚠ Minimum Requirements for Both Tier-1, Silver Healthy Nail Salon Recognition Certificate and Tier-2, Gold Healthy Nail Salon Recognition Certificate**

Healthy Nail Salons must follow the California Board of Barbering and Cosmetology in Chapter 10 of Division 3 of the Business and Professions Code and Article 12 of the State Board of Barbering and Cosmetology regulations for salon sanitation, and proper cleaning of the tools and equipment.

## STEP 7. ERGONOMIC PRACTICES

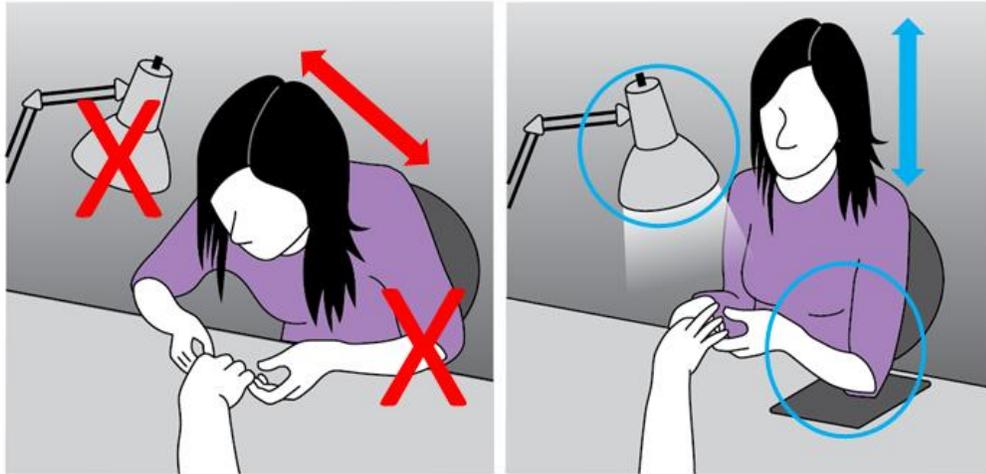
Ergonomics is the study of people's efficiency in their working environment involving how the body is positioned. Nail salon technicians often get aches and pains in their neck, back, shoulder, and joints from leaning over their workstations, doing repetitive movements, and resting their arms against the hard surfaces and/or edges of the worktable for extended periods of time. Improving the positioning of their bodies can reduce these problems and improve worker comfort and efficiency. Healthy Nail Salons should adopt ergonomic practices described below as recommendations for Tier-2, Gold certification.

### **✓ Recommendations for Tier-2, Gold Healthy Nail Salon Recognition Certificate**

Local government agencies implementing a HNSR program should recommend that salons seeking Tier-2, Gold certification adopt the following additional practices:

1. Provide chairs that are adjustable and fitted to the technician using it so that:
  - feet lie flat on the floor; use a footrest if feet don't touch the floor when the nail technician is sitting;
  - the back is supported; and
  - there is enough space between the back of the knees and the front edge of the seat to allow proper blood flow for the legs.
2. Provide direct lighting on the work area to allow for straighter posture.
3. Use a cushion to raise the client's hand or foot to allow for straighter posture.

4. Use soft pads or towels to support the hands, arms, wrists, and elbows on hard edges/surfaces.
5. Take frequent breaks to change position and/or task (if possible).
6. Pace work to prevent muscle tension.
7. Gently stretch between clients to improve blood flow and relax muscles.



Wrong Posture

Correct Posture

## STEP 8. ENVIRONMENTALLY FRIENDLY PRACTICES

Chemicals in products used by nail salons may be harmful to the environment when used or discarded. A Healthy Nail Salon can protect both the health of its workers and the health of the surrounding environment. The following practices are strongly recommended for being environmentally friendly. Healthy Nail Salons seeking Tier-2, Gold certification are advised to adopt the environmentally friendly practices listed below.

### Recommendations for Tier-2, Gold Healthy Nail Salon Recognition Certificate

Local government agencies implementing a HNSR program should recommend that salons seeking Tier-2, Gold certification implement the following additional practices:

1. Use one or a few multipurpose cleaners rather than many special-purpose cleaners. Multipurpose cleaners can clean and disinfect surfaces simultaneously, thus reducing the number of chemicals used in the work place.

2. Replace traditional janitorial cleansers with environmentally friendly products that meet the U.S. Environmental Protection Agency's Safer Choice standard. HNSR owners can check Safer Choice products at: <https://www.epa.gov/saferchoice/products>
3. If water softeners are used, use potassium chloride instead of sodium salt, or an exchange service instead of an automatic regenerating unit in areas where treated wastewater is recycled for agricultural purposes.
4. Prefer potpourri or vinegar and lemon juice over commercial air fresheners.
5. Purchase laundry detergents that have few or no phosphates.
6. Use LED lamps and install ceiling fans. Clean both regularly to maintain efficiency.
7. Recycle paper, plastic water bottles, and cardboard. Also recycle fluorescent bulbs properly.

## 5.7 Certification Process

Owners who want their nail salons to be recognized as Healthy Nail Salons must do all of the following:

1. Schedule an appointment with the HNSR program coordinator to show interest when local governments reach out to the salon owners via phone call, letter, or visit.
2. Sign the initial assessment and application form that is provided in Appendix C to join the HNSR program, and return the form to the HNSR program coordinator.
3. Comply with all applicable requirements of the California Board of Barbering and Cosmetology in Chapter 10 of Division 3 of the Business and Professions Code and Article 12 of the State Board of Barbering and Cosmetology regulations.
4. Ensure that staff, whether on payroll or contract, complete the training provided by their local government agencies.
5. Be present in the salon when the local HNSR program coordinator conducts a visit to verify the salon's eligibility for the program.
6. Meet the minimum requirements of each step defined in the HNSR program guidelines to receive a Tier-1, Silver Healthy Nail Salon certification.
7. Meet the minimum requirements and the additional requirements of each step defined in the HNSR program guidelines to receive a Tier-2, Gold Healthy Nail Salon certification.

8. If the salon is found to be out of compliance with one or more HNSR program criteria during initial inspection by the local government agency, schedule a date for re-inspection. (The example initial salon visit and training form provided in Appendix D can be used to verify salon's eligibility for local government agencies.)
9. Correct all issues or violations of the guidelines prior to re-inspection.

## 5.8 Verification of Compliance

Once a nail salon is certified as a Healthy Nail Salon, local government agencies should, at least annually, verify that the salon remains in compliance with these guidelines in order to maintain its certificate.

HNSR program coordinators should do all of the following to verify a salon's compliance with the conditions of certification specified in these guidelines:

1. Conduct an annual inspection to verify the salon's compliance, using the audit checklist provided in Appendices E and F. (Each tier has its own checklist.)
2. Hold an annual refresher training session for all salon staff, including any new hires, prior to recertifying the salon.
3. Check annually whether the salon's ownership has changed. If so, confirm the salon's intent to continue in the HNSR program and ensure that the new owner receives the training and signs the application form to maintain certification.
4. Decertify salons that have violated the applicable requirements of Cal/OSHA, DTSC, and/or the California Board of Barbering and Cosmetology in Chapter 10 of Division 3 of the Business and Professions Code and Article 12 of the State Board of Barbering and Cosmetology regulations and that have not taken action to clear such violations by a specified date.
5. Decertify salons found to be out of compliance with the HNSR program criteria and that have not taken action to resolve violations by a specified date.

## 5.9 Outreach Program/Implementation Plan Materials

DTSC will release outreach program and implementation plan materials to help local government agencies voluntarily implement a HNSR program in their jurisdictions in 2018.

## 5.10 Consumer Education Program to Create Customer Awareness

DTSC will release outreach program materials to help local government agencies conduct customer awareness and consumer education outreach in 2018.

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## Appendices

### APPENDIX A:

#### RECOMMENDATION FOR LOCAL EXHAUST VENTILATION (LEV) SYSTEMS

Manufacturer	Contact Number	Model Name	Cost		Web link to Ventilation System
			Base	Maintenance (after 8 months to 1 year)	
<b>Mobile Units</b>					
Aerovex Systems	1-800-288-2023	Healthy Air Slim Nail Source Capture System	\$865 single arm; \$935 two arms	\$40-\$250	<a href="http://aerovexsystems.com/nail-salon-air-purification-systems/products.asp?ptid=2">http://aerovexsystems.com/nail-salon-air-purification-systems/products.asp?ptid=2</a>
Salon PureAir	1-800-236-1889	Salon PureAir 1	\$1414	\$44-\$170	<a href="http://www.airsystems-inc.com/product/spa1-salon-pure-air-1/#prettyPhoto">http://www.airsystems-inc.com/product/spa1-salon-pure-air-1/#prettyPhoto</a>
Salon PureAir	1-800-236-1889	Salon PureAir 2	\$1414	\$50-\$160	<a href="http://www.airsystems-inc.com/product/spa2-salon-pure-air-2/">http://www.airsystems-inc.com/product/spa2-salon-pure-air-2/</a>
Salon PureAir	1-800-236-1889	Salon PureAir Revolution	\$1500	\$50-\$370	<a href="http://www.airsystems-inc.com/product/spa-rev-salon-pure-air-revolution/">http://www.airsystems-inc.com/product/spa-rev-salon-pure-air-revolution/</a>
AllerAir	1-888-852-8247	Salon Pro 5 Plus	\$1300 w/o UV \$1500 w/ UV	\$60-\$260	<a href="https://www.allerair.com/collections/hair-nail-salons/products/salon-pro-5-plus?variant=42969091470">https://www.allerair.com/collections/hair-nail-salons/products/salon-pro-5-plus?variant=42969091470</a>

AllerAir	1-888-852-8247	Salon Pro 6 Plus	\$1430 w/o UV \$1630 w/ UV	\$70-\$335	<a href="https://www.allerair.com/collections/hair-nail-salons/products/salon-pro-6-plus?variant=42969088974">https://www.allerair.com/collections/hair-nail-salons/products/salon-pro-6-plus?variant=42969088974</a>
AllerAir	1-888-852-8247	Salon Pro 5 Ultra	\$1630 w/o UV \$1830 w/ UV	\$50-\$400	<a href="https://www.allerair.com/collections/hair-nail-salons/products/salon-pro-5-ultra?variant=27058141891">https://www.allerair.com/collections/hair-nail-salons/products/salon-pro-5-ultra?variant=27058141891</a>
AllerAir	1-888-852-8247	Salon Pro 6 Ultra	\$1730- \$1930	\$60-\$400	<a href="https://www.allerair.com/collections/hair-nail-salons/products/salon-pro-6-ultra?variant=27059481859">https://www.allerair.com/collections/hair-nail-salons/products/salon-pro-6-ultra?variant=27059481859</a>
HealthyAir	1-800-259-2535	Source Capture Air Purifier – Standard/ Single Inlet	\$915	\$20-\$75	<a href="http://healthyair.com/products/source-capture-air-purifier/">http://healthyair.com/products/source-capture-air-purifier/</a>
HealthyAir	1-800-259-2535	Source Capture Air Purifier – Standard/ Dual Inlet	\$1035	\$20-\$75	<a href="http://healthyair.com/products/air-purifiers/source-capture-air-purifier-standard-dual-inlet-clone/">http://healthyair.com/products/air-purifiers/source-capture-air-purifier-standard-dual-inlet-clone/</a>
<b>Stationary Units</b>					
HealthyAir	1-800-259-2535	Ceiling Mount Source Capture Air Purifier – Single Inlet	\$1295	\$25-\$90	<a href="http://healthyair.com/products/ceiling-mount-source-capture-air-purifier-standard-single-inlet/">http://healthyair.com/products/ceiling-mount-source-capture-air-purifier-standard-single-inlet/</a>
HealthyAir	1-800-259-2535	Ceiling Mount Source Capture Air Purifier – Standard/ Dual Inlet	\$1415	\$25-\$90	<a href="http://healthyair.com/products/air-purifiers/ceiling-mount-source-capture-air-purifier-standard-dual-inlet/">http://healthyair.com/products/air-purifiers/ceiling-mount-source-capture-air-purifier-standard-dual-inlet/</a>

Purifier – Dual Inlet



AllerAir Salon Pro 6 Plus



Aerovex Healthy Air Slim Nail Source Capture



HealthyAir Ceiling Mount Air Purifier – Single Inlet



SalonPureAir 2

*Note: The cost information and the web links were accessed on August 7, 2017. Costs and web link addresses may change in the future.*

## **APPENDIX B: SUGGESTED IMPLEMENTATION PLAN FOR LOCAL GOVERNMENT AGENCIES**

- 1.** Compile a list of nail salons in your county/city.
- 2.** Compile a list of local beauty supply stores/distributors. Request SDSs of the products from local beauty stores or product manufacturers and review product ingredients to identify safer nail products/brands.
- 3.** Reach out to the nail salons in your county/city via phone call, letter, or visits and make a list of nail salons that show interest in joining the HNSR program. Consider bringing sample PPE (e.g., safety glasses, gloves, and N95 respirator dust masks) to the salon for visits.
- 4.** Make an appointment with the nail salons that are interested in joining the HNSR program for initial assessment and training.
  - Ensure the salon owner and all staff will be present and available to be trained on the appointment date.
  - Ensure the salon owner signs the initial assessment and application form that is provided in Appendix C.
- 5.** Make a follow-up appointment to inspect and certify the salons that completed the training and meet the HNSR program guidelines criteria. Initial salon visit and training model form is provided in Appendix D. Audit checklist model forms to certify the salon are provided in Appendices E and F. (Each tier has its own checklist.)
- 6.** Perform annual inspections of the Healthy Nail Salons to ensure they follow the HNSR program guidelines. The model audit checklist forms are provided in Appendices E and F. (Each tier has its own checklist.)
- 7.** Hold an annual refresher training session for all the salon staff (new hires and existing staff) prior to recertifying the salon. Multiple training sessions need to be scheduled if all salon staff cannot be trained at the initial training session.
- 8.** Make a follow-up appointment with the salons to verify they have corrected all issues or violations and have come into compliance with the HNSR program guidelines.
- 9.** Decertify the salons that do not meet the HNSR program criteria and do not correct issues/violations of the guidelines within a specified timeframe.

**APPENDIX C:  
INITIAL ASSESSMENT AND APPLICATION FORM**

This form is to be provided to the nail salon owner(s) that are interested in joining the HNSR program. The form must be signed and dated by the salon owner(s) and submitted to the local government agency HNSR program coordinator via e-mail or mail.

<b>Healthy Nail Salon Recognition Program Application Form</b>		
<b>Description and Eligibility Criteria</b>		
<ol style="list-style-type: none"> <li>1. Comply with all applicable requirements of the California Board of Barbering and Cosmetology in Chapter 10 of Division 3 of the Business and Professions Code and Article 12 of the State Board of Barbering and Cosmetology regulations.</li> <li>2. Comply with applicable requirements of the Division of Occupational Safety and Health (DOSH) (also known as Cal/OSHA).</li> <li>3. Comply with all applicable hazardous waste generator requirements in Chapter 6.5 of the California Health and Safety Code and in Title 22 of the California Code of Regulations.</li> <li>4. Choose safer products as defined in the HNSR program guidelines.</li> <li>5. Do not allow customers to bring in products unless they meet the program criteria.</li> <li>6. Adopt safer work practices.</li> <li>7. Use proper personal protective equipment.</li> <li>8. Handle, transfer, and store chemicals safely.</li> <li>9. Store and dispose chemical waste properly.</li> <li>10. Implement proper ventilation.</li> <li>11. Complete training for HNSR program (salon owner(s) and all staff).</li> </ol>		
<b>Section I – Contact Information</b>		
<b>Legal Name of Business:</b>	<b>Name of Owner(s):</b>	<b>Business Address:</b>
<b>Business License Number:</b>		
<b>Telephone:</b>	<b>E-mail:</b>	<b>Web Address (URL):</b>
<b>Mobile:</b>		
<b>Section II – Products Used (Please attach additional pages if needed)</b>		

<i>Nail polishes (brand and product name)</i>	
<i>Nail polish removers (brand and product name)</i>	
<i>Nail polish thinners (brand and product name)</i>	
<i>Artificial nail products (brand and product name)</i>	
<b>Section III – Salon Practices</b>	
Do you have Safety Data Sheets (SDS) on file for all your products? Yes <input type="checkbox"/> No <input type="checkbox"/> Only Some SDS <input type="checkbox"/>	
Do you purchase your supplies through a beauty supply store? Yes <input type="checkbox"/> No <input type="checkbox"/>	Which beauty supply stores?
Do you purchase your supplies through a distributor? Yes <input type="checkbox"/> No <input type="checkbox"/>	Which distributors?



**APPENDIX D: INITIAL SALON VISIT AND TRAINING**

This form is to be used for initial salon visit and training of nail salon owners and staff for the salon that submitted the initial assessment and application form to join the HNSR program.

<b>Section I – Contact Information</b>		
<b>Legal Name of Business:</b>  <b>Business License Number:</b>	<b>Name of Owner(s):</b>	<b>Business Address:</b>
<b>Telephone:</b>  <b>Mobile:</b>	<b>E-mail:</b>	<b>Web Address (URL):</b>
<b>County/City:</b>	<b>Name of the HNSR Program Coordinator:</b>	<b>Date:</b>
<b>Section II – Salon Staff Training (Please attach additional pages if needed)</b>		
Have all the nail salon staff and owners been trained on HNSR program guidelines? Yes [ ] No [ ] Some [ ] _____ (number of trained/total)		
Names of nail salon staff members trained and date of training completed:		
1.	6.	
2.	7.	
3.	8.	
4.	9.	
5.	10.	
<b>Section III – Products Used (Please attach additional pages if needed)</b>		
<i>Nail polishes that do not contain dibutyl phthalate (DBP), toluene, or formaldehyde (brand and product name)</i>		

<i>Nail polish removers that do not contain ethyl acetate or butyl acetate (brand and product name)</i>			
<i>Nail polish thinners that do not contain methyl ethyl ketone (MEK) or toluene (brand and product name)</i>			
<i>Artificial nail products that do not contain methyl methacrylate (MMA) (brand and product name)</i>			
<b>Section IV – Salon Procedures</b>			
Do all nail technicians wear nitrile gloves when using nail products, and latex or neoprene gloves when using acetone?	<input type="checkbox"/> All	<input type="checkbox"/> Some	<input type="checkbox"/> None
Does the salon provide NIOSH-approved N95 respirator dust masks for nail technicians to wear when buffing/filing nails, and providing acrylic nail services?	<input type="checkbox"/> Yes		<input type="checkbox"/> No
Do all nail technicians wear safety glasses when pouring chemicals into dispenser bottles?	<input type="checkbox"/> All	<input type="checkbox"/> Some	<input type="checkbox"/> None

Do all nail technicians ventilate the space when performing artificial nail services and when using thinners and removers?	<input type="checkbox"/> All	<input type="checkbox"/> Some	<input type="checkbox"/> None
Is there a well-ventilated designated area for artificial nail services?		<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the salon have safety data sheets (SDS) for all salon products?	<input type="checkbox"/> All	<input type="checkbox"/> Some	<input type="checkbox"/> None
Does the salon have a wall or ceiling fan, or general ventilation system that exhausts salon indoor air outside and pulls fresh air into the salon?		<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is there a mechanical ventilation unit at each workstation?	<input type="checkbox"/> All	<input type="checkbox"/> Some	<input type="checkbox"/> None
Is all hazardous waste (HW) disposed properly?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> No HW
Is there a designated area for food/drinks separate from workstations?		<input type="checkbox"/> Yes	<input type="checkbox"/> No
Is there a designated area for chemical storage separate from workstations?		<input type="checkbox"/> Yes	<input type="checkbox"/> No
Notes:			

## APPENDIX E: AUDIT CHECKLIST FOR TIER-1, SILVER CERTIFICATE

This audit checklist is to ensure nail salons comply with the HNSR program guidelines and earn Tier-1, Silver Certificate. This audit checklist is to be used for salon visit for initial certification and annual inspection of the salon. It is highly recommended to conduct the annual inspection visit **unannounced**.

Healthy Nail Salon Recognition Program Tier-1, Silver Certificate Audit Checklist		
<b>Contact Information</b>		
<b>Legal Name of Business:</b>  <b>Business License Number:</b>	<b>Name of Owner(s):</b>	<b>Business Address:</b>
<b>Telephone:</b>  <b>Mobile:</b>	<b>E-mail:</b>	<b>Web Address (URL):</b>
<b>County/City:</b>	<b>Name of Auditor:</b>	<b>Date of Audit:</b>
<b>Description and Eligibility Criteria</b> To qualify for the Healthy Nail Salon Recognition (HNSR) program, a nail salon must comply with the HNSR program guidelines as well as all applicable requirements of the Board of Barbering and Cosmetology (BBC), the Division of Occupational Safety and Health (DOSH, also known as Cal/OSHA), and the Department of Toxic Substances Control (DTSC). Healthy Nail Salons commit to choosing safer nail products, implementing safer work practices, and following good ventilation practices. The specific criteria that Healthy Nail Salons must meet are laid out in the program guidelines. This checklist is to be used by local government agencies that implement the HNSR program to document that a salon meets the guidelines' minimum requirements for Tier-1, Silver certification.		
<b>Audit Checklist</b> To be certified with Tier-1, Silver Certificate, a Healthy Nail Salon must follow these practices:  <b>A. Basic Compliance</b> <b>1.</b> Yes [ ] No [ ] Have you submitted the salon's license number to the Board of Barbering and Cosmetology (BBC) and verified the salon has no outstanding or unresolved violations of the		

applicable requirements of the California Board of Barbering and Cosmetology in Chapter 10 of Division 3 of the Business and Professions Code and Article 12 of the State Board of Barbering and Cosmetology regulations?

2. Yes  No  Have you contacted the local Certified Unified Program Agency (CUPA) and verified the salon has no outstanding or unresolved violations of applicable hazardous waste generator requirements?

3. Yes  No  Have you contacted the Division of Occupational Safety and Health (DOSH, also known as Cal/OSHA) and verified the salon has no outstanding or unresolved violations of applicable worker health and safety requirements?

#### **B. Training**

1. Yes  No  Have all salon staff (owners, employees, and contractors) attended your agency's training session on the requirements for a Healthy Nail Salon laid out in the HNSR program guidelines?

2. Yes  No  Have you verified that the HNSR program training materials are available to salon staff in their native languages?

#### **C. Record Keeping and Documents**

1. Yes  No  Have you verified that the salon has compiled SDSs for all products used in the salon in a binder?

2. Yes  No  Have you verified that the SDS binder is available to staff?

#### **D. Products**

1. Yes  No  Have you verified that none of the nail polishes, lacquers, base coats, top coats, and gel polishes in use in the salon do not list dibutyl phthalate (DBP), toluene, or formaldehyde in the salon's SDS binder?

2. Yes  No  If the salon uses nail polish thinners, have you verified that they do not list toluene or methyl ethyl ketone (MEK) in the SDS binder?

3. Yes  No  Have you verified that nail polish removers used in the salon do not list ethyl acetate or butyl acetate in the salon's SDS binder?

4. Yes  No  Have you verified that artificial nail products, gel nail products, and nail polishes that are used in the salon do not list liquid methyl methacrylate (MMA) monomer in the salon's SDS binder?

5. Yes  No  Does the salon have and follow a policy not to allow customers to bring in products unless they meet the program criteria?

### **E. Personal Protective Equipment**

1. Yes  No  Does the salon have and follow a policy to wear nitrile gloves when handling nail products and wear latex or neoprene gloves when handling acetone?

2. Yes  No  Does the salon provide NIOSH-approved N95 respirator dust masks to prevent exposure to dust when buffing/filing nails and providing acrylic nail services? Does the salon have and follow a policy not to allow the use of surgical masks?

3. Yes  No  Have you verified that the salon ensures that safety glasses/goggles are available for staff to use?

**\*\*Recommendation:** Yes  No  Does the salon have and follow a policy to wear long sleeves and cover legs (pants or skirts at least knee length or lab coat type clothing with long sleeves) to prevent direct skin contact with chemicals and acrylic dust?\*

### **F. Handling/Storing Chemicals**

1. Yes  No  Does the salon have and follow a policy to label both containers when chemicals are transferred from large containers to small bottles?

2. Yes  No  Does the salon have and follow a policy that technicians wear safety glasses/goggles and proper gloves when transferring chemicals?

3. Yes  No  Does the salon have and follow a policy not to store large chemical bottles at workstations?

4. Yes  No  Have you verified that the salon does not store chemicals close to areas where food and drinks are stored?

5. Yes  No  Does the salon have a designated area for chemical storage that is away from heat and ignition sources?

6. Yes  No  Does the salon have and follow a policy to transfer chemicals from large bottles to small bottles in a well-ventilated area?

### **G. Chemical Waste Disposal**

1. Yes  No  If the salon generates hazardous waste, have you verified that it has been inspected by the local CUPA and that it has no unresolved hazardous waste violations?

2. Yes  No  If the salon says it does not generate hazardous waste, does that make sense? (i.e., Does the salon have/use products, such as thinners and polishes that, when no longer needed, could be considered hazardous waste?)

3. Yes  No  Do you observe any waste handling/disposal practices at the salon that seem unsafe or non-compliant (e.g., solvent odors, strong-smelling products being disposed of in the trash or down the drain)?

#### **H. Work Habits**

1. Yes  No  Does the salon have and follow a policy that workers wash their hands with soap and water before eating, drinking, applying cosmetics, and smoking?

2. Yes  No  Does the salon provide a designated area for eating and drinking that is separate from work areas?

3. Yes  No  Does the salon have and follow a policy that workers not eat, drink, or smoke in work areas?

4. Yes  No  Does the salon have and follow a policy that non-metal tools are discarded after use, not re-used?

5. Yes  No  Does the salon have and follow a policy not to allow use of clients' personal tools?

#### **I. Sanitation**

1. Yes  No  Have you verified with the California Board of Barbering and Cosmetology (BBC) that the salon has no unresolved violations of the requirements of the California Board of Barbering and Cosmetology in Chapter 10 of Division 3 of the Business and Professions Code and Article 12 of the State Board of Barbering and Cosmetology regulations for salon sanitation, proper cleaning of tools and equipment, etc.?

#### **J. Ventilation**

1. Yes  No  Does the salon have and follow a policy to ensure the salon is ventilated properly?

Ventilation system or  Doors & Windows

2. Yes  No  Do you notice a chemical odor in the salon?

**3.** Yes  No  Has the salon designated a well-ventilated area and installed a local exhaust ventilation (LEV) system for acrylic nail services?

Notes:

## APPENDIX F: AUDIT CHECKLIST FOR TIER-2, GOLD CERTIFICATE

This audit checklist is to ensure nail salons comply with the HNSR program guidelines and earn Tier-2, Gold Certificate. This audit checklist is to be used for salon visit for initial certification and annual inspection of the salon. It is highly recommended to conduct the annual inspection visit **unannounced**.

<b>Healthy Nail Salon Recognition Program Tier-2, Gold Certificate Audit Checklist</b>		
<b>Contact Information</b>		
<b>Legal Name of Business:</b>  <b>Business License Number:</b>	<b>Name of Owner(s):</b>	<b>Business Address:</b>
<b>Telephone:</b>  <b>Mobile:</b>	<b>E-mail:</b>	<b>Web Address (URL):</b>
<b>County/City:</b>	<b>Name of Auditor:</b>	<b>Date of Audit:</b>
<p><b>Description and Eligibility Criteria</b></p> <p>To qualify for the Healthy Nail Salon Recognition (HNSR) program, a nail salon must comply with the HNSR program guidelines as well as all applicable requirements of the Board of Barbering and Cosmetology (BBC), the Division of Occupational Safety and Health (DOSH, also known as Cal/OSHA), and the Department of Toxic Substances Control (DTSC). Healthy Nail Salons commit to choosing safer nail products, implementing safer work practices, and following good ventilation practices. The specific criteria that Healthy Nail Salons must meet are laid out in the program guidelines. This checklist is to be used by local government agencies that implement the HNSR program meets the minimum requirements for certification and the additional requirements defined in the program guidelines to be eligible for Tier-2, Gold Certificate. Sections K and L are recommendations to be followed by the nail salons that are seeking Tier-2, Gold Certificate.</p>		
<p><b>Audit Checklist</b></p> <p>To be certified with Tier-2, Gold Certificate, a Healthy Nail Salon must follow these practices:</p> <p><b>A. Basic Compliance</b></p>		

1. Yes  No  Have you submitted the salon’s license number to the Board of Barbering and Cosmetology (BBC) and verified the salon has no outstanding or unresolved violations of the applicable requirements of the California Board of Barbering and Cosmetology in Chapter 10 of Division 3 of the Business and Professions Code and Article 12 of the State Board of Barbering and Cosmetology regulations?

2. Yes  No  Have you contacted the local Certified Unified Program Agency (CUPA) and verified the salon has no outstanding or unresolved violations of applicable hazardous waste generator requirements?

3. Yes  No  Have you contacted the Division of Occupational Safety and Health (DOSH, also known as Cal/OSHA) and verified the salon has no outstanding or unresolved violations of applicable worker health and safety requirements?

**B. Training**

1. Yes  No  Have all salon staff (owners, employees, and contractors) attended your agency’s training session on the requirements for a Healthy Nail Salon laid out in the HNSR program guidelines?

2. Yes  No  Have you verified that the HNSR program training materials are available to salon staff in their native languages?

**C. Record Keeping and Documents**

1. Yes  No  Have you verified that the salon has compiled SDSs for all products used in the salon in a binder?

2. Yes  No  Have you verified that the SDS binder is available to staff?

**D. Products**

1. Yes  No  Have you verified that none of the nail polishes, lacquers, base coats, top coats, and gel polishes in use in the salon do not list dibutyl phthalate (DBP), toluene, or formaldehyde in the SDS binder?

2. Yes  No  If the salon uses nail polish thinners, have you verified that they do not list toluene or methyl ethyl ketone (MEK) in the SDS binder?

3. Yes  No  Have you verified that nail polish removers used in the salon do not list ethyl acetate or butyl acetate in the SDS binder?

4. Yes  No  Have you verified that artificial nail products, gel nail products, and nail polishes that are used in the salon do not list liquid methyl methacrylate (MMA) monomer in the SDS binder?

5. Yes [ ] No [ ] Does the salon have and follow a policy not to allow customers to bring in products unless they meet the program criteria?

### **E. Personal Protective Equipment**

1. Yes [ ] No [ ] Does the salon have and follow a policy to wear nitrile gloves when handling nail products and wear latex or neoprene gloves when handling acetone?

2. Yes [ ] No [ ] Does the salon provide NIOSH-approved N95 respirator dust masks to prevent exposure to dust when buffing/filing nails and providing acrylic nail services? Does the salon have and follow a policy not to allow the use of surgical masks?

3. Yes [ ] No [ ] Have you verified that the salon ensures that safety glasses/goggles are available for staff to use?

**\*\*Recommendation:** Yes [ ] No [ ] Does the salon have and follow a policy to wear long sleeves and cover legs (pants or skirts at least knee length or lab coat type clothing with long sleeves) to prevent direct skin contact with chemicals and acrylic dust?\*

### **F. Handling/Storing Chemicals**

1. Yes [ ] No [ ] Does the salon have and follow a policy to label both containers when chemicals are transferred from large containers to small bottles?

2. Yes [ ] No [ ] Does the salon have and follow a policy to wear safety glasses/goggles and proper gloves when transferring chemicals?

3. Yes [ ] No [ ] Does the salon have and follow a policy to not to store large chemical bottles at workstations?

4. Yes [ ] No [ ] Does the salon have and follow a policy to not to store chemicals close to areas where food and drinks are stored?

5. Yes [ ] No [ ] Has the salon designated an area for chemical storage that is away from heat and ignition sources?

6. Yes [ ] No [ ] Does the salon have and follow a policy to transfer chemicals from large bottles to small bottles in a well-ventilated area?

### **G. Chemical Waste Disposal**

1. Yes [ ] No [ ] If the salon generates hazardous waste, have you verified that it has been inspected by the local CUPA and that it has no unresolved hazardous waste violations?

2. Yes [ ] No [ ] If the salon says it does not generate hazardous waste, does that make sense? (i.e., Does the salon have/use products, such as thinners and polishes, that, when no longer needed, could be considered hazardous waste?)

3. Yes [ ] No [ ] Do you observe any waste handling/disposal practices at the salon that seem unsafe or non-compliant (e.g., solvent odors, strong-smelling products being disposed of in the trash or down the drain)?

### **H. Work Habits**

1. Yes [ ] No [ ] Does the salon have and follow a policy that workers wash their hands with soap and water before eating, drinking, applying cosmetics, and smoking?

2. Yes [ ] No [ ] Does the salon provide a designated area for eating and drinking that is separate from work areas?

3. Yes [ ] No [ ] Does the salon have and follow a policy that workers not eat, drink, or smoke in work areas?

4. Yes [ ] No [ ] Does the salon have and follow a policy that non-metal tools are discarded after use not re-used?

5. Yes [ ] No [ ] Does the salon have and follow a policy not to allow use of clients' personal tools?

### **I. Sanitation**

1. Yes [ ] No [ ] Have you verified with the California Board of Barbering and Cosmetology (BBC) that the salon has no unresolved violations of the requirements of the California Board of Barbering and Cosmetology in Chapter 10 of Division 3 of the Business and Professions Code and Article 12 of the State Board of Barbering and Cosmetology regulations for salon sanitation, proper cleaning of tools and equipment, etc.?

### **J. Ventilation**

1. Yes  No  Does the salon have and follow a policy to ensure the salon is ventilated properly?

Ventilation system or  Doors & Windows

2. Yes  No  Do you notice a chemical odor in the salon?

3. Yes  No  Has the salon designated a well-ventilated area for artificial nail services?

4. Yes  No  Does the salon have at least one of the following ventilation systems?

A heating, ventilation, and air conditioning (HVAC) system

A local exhaust ventilation (LEV) system

A downdraft ventilated nail table that exhausts outside

5. Yes  No  Does the salon have and follow a policy to keep the ventilation system on during work hours?

6. Yes  No  Does the salon have and follow a policy to clean/change filters of all ventilation systems regularly?

**Recommendations:**

Following recommendations in sections K and L is advisory and does not affect the eligibility criteria.

**K. Ergonomic Practices**

1. Yes  No  Does the salon have adjustable chairs that are fitted accordingly to the technician?

2. Yes  No  Does the salon provide direct lighting on work area to allow for straighter posture?

3. Yes  No  Do the salon's technicians use soft pads or towels to support the hands, arms, wrists, and elbows on hard edges/surfaces?

**L. Environmentally Friendly Practices**

1. Yes  No  Does the salon exclusively use Safer Choice products by U.S. EPA?

2. Yes  No  If the salon uses air fresheners, does it use potpourri or vinegar and lemon juice rather than commercial air fresheners?

**3.** Yes  No  Does the salon have and follow a policy to recycle fluorescent bulbs, paper, plastic water bottles, and cardboards?

Notes: